

## REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 15-28 have been rejected under 35 U.S.C. § 112, second paragraph, as being vague and indefinite; Claims 15, 18-25, 27 and 28 have been rejected under 35 U.S.C. § 102 as being anticipated by Tone et al.; and Claims 16, 17 and 26 have been rejected under 35 U.S.C. § 103 as being unpatentable over Tone et al.. New Claims 29-39 have been added while former Claims 1-28 have been canceled, without prejudice, and thus, Claims 29-39 remain active.

Considering first then the rejection of Claims 15-28 under 35 U.S.C. § 112, second paragraph, it is to be noted that such claims have now been canceled, without prejudice, with new Claims 29-39 being submitted for closer compliance with U.S. patent practice and procedure.

Considering next then the rejection of Claims 15, 18-25, 27 and 28 under 35 U.S.C. § 102 as being anticipated by Tone et al. and the rejection of Claims 16, 17 and 26 under 35 U.S.C. § 103 as being unpatentable over Tone et al., it is to be noted, as emphasized on page 13, lines 16-37 of the present application, in accordance with the present invention, at least one of the backing sheet 31 of the conducting element, the tie sheet 22 and the additional sheet 23 or the covering sheet 24, when one is present, is, at least one of its sides, placed set back toward the interior of the structure relative to the associated free edge of the first substrate 20 so as to leave a portion 32 of the conducting element bare or exposed on at least one of its faces 30a or 30b. The connection means 40 that connect the conducting element 30 to the electrical ground of the display advantageously comprise a flat conductor such as a busbar or a conductive foam tape that is connected to the exposed portion 32 of one of the

faces 30a or 30b of the conducting element 30 by adhesive bonding or by mechanical clamping.

The connection means 40 are thus made independent of the conducting element 30, the shielding structure not needing to intrinsically include the electrical connection means, thereby making it easier to manufacture the shielding structure and the displays.

In view of the foregoing, it can be appreciated that significant advantages are obtained by providing the setback towards the interior of the structure relative to the associated free edge of the first substrate or other elements forming the structure so as to leave a portion of the conducting element bare or exposed on at least one of its faces. In view of the foregoing, Claim 29 has now been introduced which claims the fact that the connection member comprises a substantially flat conductor and is connected to an exposed portion of the conducting element. By comparison to the present invention, it is noted that EP '018 only discloses an electroconductive frame member 16 or 6 which is placed in the electroconductive fiber mesh 12, this frame member, however, not being equivalent to the conductor of the present invention. Furthermore, the heat bond film 11 shown in EP '018 does not correspond with Applicants' claimed transparent tie sheet, backing sheet, plastic sheet or second transparent substrate, one of which is set back so as to form an exposed portion within which the electrical connection member is positioned. Accordingly, EP '018 cannot provide the advantages provided in accordance with the present invention, does not teach the structure claimed and contains no teaching or suggestion of modifying the structure of EP '018 to meet Applicants' claim limitations. It is therefore submitted that Claim 29 clearly patentably defines over EP '018 as well as the remaining references of record.

Each of Claims 30-39 set forth additional limitations which, it is submitted, have no corresponding teaching or disclosure in EP '018 or any of the remaining references of record. Accordingly, it is submitted that each of Claims 29-39 merits indication of allowability with the same being hereby respectfully requested.

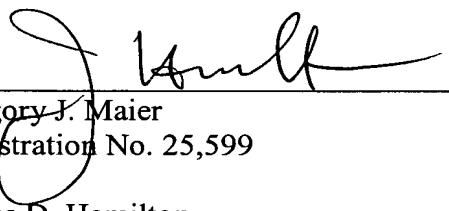
Respectfully submitted,

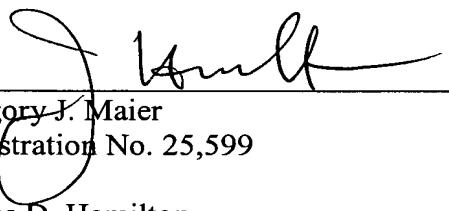
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